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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:

MYISHA N. CHAMBERS,  
  
Debtor.

Case No.: 2:22-bk-13098-MKN

Chapter 7

MYISHA N. CHAMBERS,  
  
Plaintiff,  
v.

U.S. DEPARTMENT OF EDUCATION;  
HIGHER EDUCATION LOAN AUTHORITY  
OF THE STATE OF MISSOURI (MOHELA),  
  
Defendants.

Adv. Proceeding No.: 22-01149-mkn

**UNITED STATES' ANSWER TO  
COMPLAINT TO DETERMINE  
DISCHARGE OF STUDENT  
LOAN**

The United States, on behalf of its agency, the Department of Education ("United States"), responds to the allegations and numbered paragraphs of Plaintiff's Complaint to Determine Discharge of Student Loan as set forth below.

1. The United States admits the allegations in paragraph 1.

2. The allegations in paragraph 2 state legal conclusions to which no response is required.

/ / /

1           3.       The United States admits that it issued a series of education loans to the  
2 Plaintiff from 1993 – 2002, including a final consolidation loan in July 2022 in the amount  
3 of \$32,946.68 that is the subject of the Complaint.

4           4.       The United States lacks sufficient knowledge to admit or deny the allegations  
5 in paragraph 4 and therefore denies same.

6           5.       The United States lacks sufficient knowledge to admit or deny the allegations  
7 in paragraphs 5-13 and therefore denies same.

8           6.       The United States admits that Plaintiff received an IDR plan in or around  
9 2013 or 2014. The United States lacks sufficient knowledge to admit or deny the remaining  
10 allegations in paragraph 14 and therefore denies same.

11          7.       The United States lacks sufficient knowledge to admit or deny the allegations  
12 in paragraphs 15-16 and therefore denies same.

13          8.       The United States admits that Plaintiff is currently enrolled in an Income  
14 Based Repayment (IBR) Plan, with a monthly payment of \$0.00 for 18 months. The United  
15 States lacks sufficient knowledge to admit or deny the remaining allegations in paragraph 17  
16 and therefore denies same.

17          9.       The United States lacks sufficient knowledge to admit or deny the allegations  
18 in paragraph 18 and therefore denies same.

19          10.      The United States admits that the balance of Plaintiff's July 2022  
20 consolidation loan is \$32,946.68. The United States lacks sufficient knowledge to admit or  
21 deny the remaining allegations in paragraph 18 and therefore denies same.

22          11.      The United States admits that Schedule J to Plaintiff's bankruptcy petition  
23 states that Chambers has roughly \$1,364 in household/living expenses and income in the  
24 amount of approximately \$1,308.33. The United States lacks sufficient knowledge to admit  
25 or deny the remaining allegations in paragraph 20 and therefore denies same.

26          12.      The United States lacks sufficient knowledge to admit or deny the allegations  
27 in paragraphs 21-23 and therefore denies same.  
28

1 To the extent there are any other allegations in the complaint to which the United  
2 States has not expressly admitted or otherwise responded above, the United States denies  
3 such allegations.

4 Having responded to all allegations, the United States requests a judgment finding  
5 that Plaintiff's indebtedness to the United States is not dischargeable, and for such other relief  
6 as the Court deems proper.

7 Respectfully submitted this 12th day of December 2022.

8  
9 JASON M. FRIERSON  
United States Attorney

10 /s/ Summer A. Johnson  
11 SUMMER A. JOHNSON  
12 Assistant United States Attorney  
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**Certificate of Service**

I hereby certify that on December 12, 2022, I caused to be electronically filed and served on registered counsel of record the foregoing United States' Answer to Complaint to Determine Discharge of Student Loan with the Clerk of the Court for the United States Bankruptcy Court for the District of Nevada using the CM/ECF system.

/s/ Summer A. Johnson  
SUMMER A. JOHNSON  
Assistant United States Attorney